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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RICHARD L. CHANG,

Plaintiff,

v.

ZHENG TAO HAN, an individual; CHI-MING
WU a/k/a/ FRED WU, an individual;
BIOSUCCESS BIOTECH, CO., LTD., a Cayman
Islands corporation; BIOSUCCESS BIOTECH,
CO., LTD., a Nevada corporation, and DOES 1
through 50, inclusive.

Defendants.

Case No.: 5:14-CV-00426-EJD

**DEFENDANTS' NOTICE OF INTENT
TO FILE FIRST AMENDED
COUNTERCLAIMS BY MAY 29, 2014**

[Pursuant to F.R.C.P. 15]

Ctrm: 4-5TH Floor
Honorable Edward J. Davila

DEFENDANTS' NOTICE

On May 8, 2014, Plaintiff filed/served a 12(b)(6) motion to dismiss Defendants' counterclaims. [See Dkt No. 35]. On May 22, 2014, the Court denied Defendants' ex parte motion to set a briefing schedule and maintained a briefing schedule where Defendants' Opposition to Plaintiff's 12(b)(6) motion is due on May 22. [See Dkt No. 48].

Pursuant to F.R.C.P. 15(a)(1)(B), Defendants have 21 days from the filing/service of Plaintiff's 12(b)(6) motion to dismiss to file amended counterclaims. Therefore, please take notice that Defendants intend to file their First Amended Counterclaims by no later than Thursday, May 29, 2014.

Dated: May 22, 2014

LEE TRAN & LIANG LLP

By: /s/ Enoch H. Liang
Enoch H. Liang
Attorneys for Defendants